

REINHEIMER & REINHEIMER
200 Main Street, P.O. Box 1086
Toms River, New Jersey 08754
(732) 349-4650
Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

	*	
IN RE:	*	CASE NO. 06-12760 (MBK)
	*	CHAPTER 7
DIANE MERLUCCI	*	
	*	HEARING DATE: June 29, 2009
	*	HEARING TIME: 9:00 A.M.
Debtor	*	
	*	NOTICE OF MOTION TO RETURN
	*	UNCLAIMED FUNDS TO DEBTOR

TO:

Chapter 7 Standing Trustee Thomas J. Orr, Esquire 321 High Street Burlington, NJ 08016	New Century Financial Services c/o Pressler and Pressler 16 Wing Drive Cedar Knolls, NJ 07927

PLEASE TAKE NOTICE that on the 29th day of June, 2009 at 9:00 a.m. or as soon as counsel may be heard before the Honorable Michael B. Kaplan, U.S.B.J., the undersigned attorney for Debtor, Diane Merlucci, shall move before the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, for an Order returning unclaimed funds to Debtor.

TAKE FURTHER NOTICE that if you contest this motion you or your attorney must appear in Court on the date noted above and you are further required to file opposition with the Court and serve same on the undersigned no later than seven (7) days

prior to the hearing date set forth herein. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the deadline stated above. You must also mail a copy to:

Linda S. Reinheimer, Esquire
REINHEIMER & REINHEIMER
200 Main Street
P.O. Box 1086
Toms River, NJ 08754

and attend a hearing scheduled on June 29, 2009 at 9:00 a.m. in the Courtroom of the Honorable Michael B. Kaplan, U.S.B.J. in the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you or your attorney do not take these steps, the court may decide to enter an order granting the relief requested.

TAKE FURTHER NOTICE that Movant will rely on the Certification of Linda S. Reinheimer, Esq. in support of the motion. Movant also requests a ruling on the papers unless timely opposition is filed.

TAKE FURTHER NOTICE that unless timely responsive pleadings are filed on or before (7) seven days prior to the hearing date, this motion shall be deemed uncontested.

CERTIFICATION

I HEREBY CERTIFY that the original of the within motion to return unclaimed funds to Debtor, together with supporting documentation and proposed form of order have been filed with the Clerk of the United States Bankruptcy Court, 402 East State Street, 2nd Floor, Trenton, NJ 08608.

A copy of said notice of motion and supporting documentation have been sent to each of the parties listed above pursuant to applicable Rules of Court.

Dated: June 3, 2009

/s/ LINDA S. REINHEIMER, ESQ.